

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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IN RE: PETITION OF ATMOS ENERGY)
CORPORATION FOR APPROVAL OF)
GAS TRANSPORTATION AGREEMENT)
WITH THE GOODYEAR TIRE AND)
RUBBER COMPANY)
)
)
)
)
)

DOCKET NO. 03-00540

JOINT MOTION TO CONVENE STATUS CONFERENCE

Pursuant to the *Order Granting Petition to Commence a Contested Case and to Intervene and Requesting Proposed Protective Order and Procedural Schedule* providing that the Parties may file a joint proposal regarding a procedural schedule in this matter, including three proposed hearing dates, the Staff of the Energy and Water Division of the Tennessee Regulatory Authority ("Staff") and Atmos Energy Corporation ("Atmos") move to convene a status conference in this matter. The Parties offer the following grounds as support for this motion:

1. Staff issued a data request on October 9, 2003. Atmos filed partial responses to the October 9, 2003 data request on October 22, 2003 and November 6, 2003. Atmos stands ready to provide the remainder of its responses to Staff data requests upon the entry of a protective order. The Parties have filed an agreed protective order for the Hearing Officer's consideration. With a protective order in place, Staff will accept and review the remainder of Atmos' responses to Staff's data requests as quickly as can be done in a thorough manner.

2. Upon the completion of Staff's review of the remainder of Atmos' responses to the Staff's data requests, the Parties intend to meet informally to explore the possibility of submitting an agreed order which, upon approval by the Hearing Officer, would resolve this docket. The Parties intend to have such a meeting prior to the status conference requested by this motion.

3. Based on the foregoing, the Parties submit that filing a formal procedural schedule setting forth dates for the exchange of discovery and the submission of pre-filed testimony would be premature given that additional discovery and a hearing of this matter may be unnecessary. For the same reasons, dates for a hearing would likewise be premature at this time.

4. The Parties agree that the following dates and times would be acceptable for a status conference in this matter: the morning of April 12, the morning of April 14, or the morning of April 19.

Based on the foregoing, the Parties respectfully move that a status conference be convened as requested above.

Respectfully submitted,



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